



# **SQUIBB RCRA INCINERATOR PERMIT RENEWAL**

## **HUMACAO, PUERTO RICO**

### ***RCRA FACILITY UPDATE***

May 1998

As a part of EPA's commitment to facilitate public participation in the decision-making process for the Squibb incinerators permit renewal, EPA prepared this update to keep the public informed of the current status and important issues related to the permit renewal.

#### ***Introduction***

The purpose of trial burns is to test an incinerators' ability to meet all applicable performance standards set by EPA regulations. Trial burns were conducted at all three incinerators at the Squibb facility, Caloric 1, Caloric 2 and the Trane. The Trane is currently operating under a RCRA permit. The Caloric 1 is an interim status unit that is authorized to only burn ignitable wastes. Caloric 2 is a new unit and will not operate until it is permitted.

#### ***Incinerator Trial Burns***

The public was formally notified of the scheduled trial burns by local newspaper and radio announcement on November 12. In addition, individuals on the facility mailing list were also notified of these activities. The trial burns for two incinerators, Trane and Caloric II, began on December 8 and ended on December 20, 1997. The trial burn for the third incinerator unit, Caloric 1, was performed three weeks later in mid-January, 1998. EPA personnel were present during the trial burns to ensure that they were consistent with the EPA-approved trial burn plan.

In response to EPA's request, Squibb agreed to allow local residents to observe some of the preparation for the trial burn for Caloric 1. Accompanied by the EPA project manager, local residents toured the facility. The site visit provided local residents with an opportunity to see the operations of the facility. In addition, Squibb personnel gave a brief explanation of the processes and answered a number of questions from the local residents.

During the trial burn for each incinerator, two operating conditions are tested: a high temperature and a low temperature. These two conditions are used to set the upper and

lower limits of the temperature range at which the incinerators can be properly operated.

#### ***Preliminary Trial Burn Results***

EPA has recently received preliminary trial burn results from Squibb. The results indicate that the Caloric incinerators did not meet the performance standards for the low temperature condition. At the high temperature conditions, the performance standards were achieved. The Trane incinerator met the performance standards for the wastes that it is currently permitted to burn. The trial burn also tested the effectiveness of burning other chemicals, not currently included in the permit renewal application. The Trane did not meet the performance standards for these other chemicals at low temperature conditions.

Squibb has requested an opportunity to re-conduct the trial burns. However, EPA's guidance (OSWER Directive 9498.1994(4)), prohibits a retest unless a facility has made changes to its process (i.e., design and/or operating conditions), that are likely to correct the problems encountered in the failed trial burn test. EPA has requested that Squibb submit documentation that investigates the causes for not meeting the performance standards at low temperatures. Based on the investigation, Squibb must propose substantive changes to the trial burn plan that would be expected to result in a fully successful trial burn. EPA will review this document and determine if a retest is appropriate. An EPA incineration expert will be present for any retest.

#### ***Incinerator Risk Assessment***

Before a draft permit can be issued for public comment, Squibb must demonstrate that its incinerators can meet EPA's incinerator performance standards. Squibb must also

demonstrate through a risk assessment analysis, that any air emissions from the incinerators will not pose an adverse human health risk.

the actual trial burn data. In addition, the final approval of the risk assessment will be contingent upon public comment of the draft permit.

EPA has completed its review of Squibb's Risk Assessment and has tentatively determined that the methodology and assumptions used in the Risk Assessment are appropriate and reasonable. This determination, however, will not be final until Squibb resubmits the Risk Assessment using

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